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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

IGNACIO SANCHEZ, et al.

Defendants.

CASE NO. 1:25-CR-00132-JLT-SKO

STIPULATION AND ORDER TO CONTINUE
STATUS CONFERENCE

IT IS HEREBY STIPULATED by and between the parties that the status conference set for December 3, 2025, at 1:00 pm before the Honorable Sheila K. Oberto be continued to June 3, 2026 at 1:00 p.m as to all defendants.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. December 3, 2025, is the first status conference in the above-captioned case.
2. The parties and the United States have been engaged in plea negotiation.
3. The government has previously turned over Volumes 1 and 2 of discovery, comprising approximately 200 GB of discovery as well as approximately 6200 Bates-numbered pages.
4. The government is in the process of producing Volume 3 of discovery, comprising approximately 15 GB of discovery and 2071 Bates-stamped pages.
5. Additional individual discovery has also been produced as appropriate.

1 6. Given the volume of discovery and complexity of the case, the parties believe that it will
2 take approximately six months for the parties to examine discovery and engage in meaningful plea
3 negotiations.

4 7. Additionally, many defendants face connected proceedings in state court, which
5 necessitates additional coordination in order to reach any global resolution.

6 8. By this stipulation, the parties now move to continue the status conference, and to
7 exclude time from December 3, 2025, to June 3, 2026.

8 9. The parties agree and stipulate, and request that the Court find the following:

9 a) The government has represented that the initial discovery associated with this
10 case includes investigative reports, and related documents, photographs, etc., in electronic form.
11 All of this discovery has been either produced directly to counsel and/or made available for
12 inspection and copying. Substantial additional discovery is anticipated to be produced before the
13 next hearing. Defense would like additional time to review discovery and investigate the
14 foundation for a resolution by plea or trial further.

15 b) The government does not object to the continuance.

16 c) An ends-of-justice delay is particularly apt in this case because:

- 17 • Defendant needs additional time to review discovery, and conduct additional
18 investigation; and
19
20 • The parties need additional time to investigate/explore matters related to
21 proceeding via plea or trial.

22 d) Based on the above-stated findings, the ends of justice served by continuing the
23 case as requested outweigh the interest of the public and the defendant in a trial within the
24 original date prescribed by the Speedy Trial Act.

25 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
26 et seq., within which trial must commence, the time period of December 3, 2025 to June 3, 2026,
27 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) because
28 it results from a continuance granted by the Court at defendants' request on the basis of the

Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.

10. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: November 21, 2025

Respectfully submitted,

ERIC GRANT
United States Attorney

By /s/ Robert L. Veneman-Hughes, Antonio J. Pataca, and Luke B. Baty
ROBERT L. VENEMAN-HUGHES
ANTONIO J. PATACA
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Assistant United States Attorneys

Dated: November 21, 2025

By: /s/ Marc Days
Marc Days
Attorney for Defendant
Ignacio Sanchez

Dated: November 21, 2025

By: /s/ Mark Coleman
Mark Coleman
Attorney for Defendant
Ray Pinon

Dated: November 21, 2025

By: /s/ John Garland
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Attorney for Defendant
Benny Gonzales

Dated: November 21, 2025

By: /s/ Griffin Estes
Griffin Estes
Attorney for Defendant
Ramona Felisciano

Dated: November 21, 2025

By: /s/ Danica Mazenko
Danica Mazenko
Attorney for Defendant
Jennifer Escobedo

Dated: November 21, 2025

By: /s/ Eric Kersten
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Attorney for Defendant
Armando Alfaro

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By: /s/ Timothy Hennessy
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Luis Aguilar

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By: /s/ Yan Shrayberman
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Carly Balboa

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Timothy Chenot

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Attorney for Defendant
Barbara Diaz

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By: /s/ Richard Beshwate
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Carly Balboa

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By: /s/ Patrick Aguirre
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Susanna Garcia

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Axel Guevera

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Gilberto Hernandez

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Mai Shawwa
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Dated: November 21, 2025

By: /s/ Kresta Daly
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Attorney for Defendant
Ricardo Lopez

Dated: November 21, 2025

By: /s/ Michael McKneely
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Attorney for Defendant
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Bridgette Murphy

Dated: November 21, 2025

By: /s/ Adilene Flores Estrada
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By: /s/ Michael Hansen
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By: /s/ Roger Bonakdar
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By: /s/ Victor Nasser
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Dated: November 21, 2025

By: /s/ David Torres
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Hemir Velazquez

Dated: November 21, 2025

By: /s/ Robert Lamanuzzi
Robert Lamanuzzi
Attorney for Defendant
Louis Bonilla

Dated: November 21, 2025

By: /s/ Galatea DeLapp
Galatea DeLapp
Attorney for Defendant
Crystal Martinez

ORDER

The status conference set for December 3, 2025, is continued to June 3, 2026, at 1:00 p.m. Time is excluded through and including June 3, 2026, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: November 24, 2025

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE